

December 18, 2020

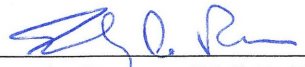
## MEMO ENDORSED

**VIA ECF**

Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Plaintiff's request to stay the case for 60 days is granted. Plaintiff is directed to submit a status report at the end of the 60-day period, on February 16, 2021.

It is SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: 12/18/2020  
New York, New York

Re: Wolman v. Complex Media, 1:20-cv-00152 (ER)

Dear Judge Ramos:

Liebowitz Law Firm, PLLC ("LLF") represented Plaintiff Baron Wolman in the above-referenced case and initiated this lawsuit on his behalf. We write in response to Defendant Complex Media, Inc. ("Defendant")'s letter [Dkt. # 9] and to respectfully request, for good cause shown, that the Court STAY this action and all pending deadlines for a period of sixty days.

On November 2, 2020, Mr. Wolman, a famed photographer, passed away at the age of 83. A *Rolling Stone* magazine article about Mr. Wolman is attached hereto as Exhibit A. Undersigned counsel, an associate of LLF, intends to file a notice of appearance on behalf of Mr. Wolman's Estate if authorized to do so. However, the affairs of the Estate have not been settled and therefore undersigned counsel will not be filing a notice of appearance in the short term until he has express authorization to do so. As far as we know, Mr. Wolman did not have a family and a designated representative of the Estate has not yet been appointed. It is also possible that the Estate will seek alternate counsel.

For that reason, we respectfully request that the Court STAY the action for a period of sixty days, so as to provide Mr. Wolman's Estate the opportunity to decide how it seeks to proceed with counsel, and to substitute the proper party under Fed.R.Civ.P. 25(a).

Finally, defense counsel's assertion that I am disqualified from appearing in this District as a result of Richard Liebowitz's interim suspension is not well founded. The Grievance Committee's order is directed at Mr. Liebowitz, not to LLF or any of its associates.

We thank the Court for Your Honor's consideration.

Respectfully Submitted,

s/jameshfreeman/  
James H. Freeman